

# Rickner PLLC

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December 21, 2021

**Via ECF**

Hon. Vernon S. Broderick  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**APPLICATION GRANTED  
SO ORDERED**

**VERNON S. BRODERICK  
U.S.D.J. 12/22/2021**

On or before January 27, 2022, the parties are directed to file a joint status update on the prospects of settlement and whether there is any need to extend the stay of discovery.

Re: *G & G Closed Circuit Events LLC v. Bertolini et al.*, 21-cv-07351-VSB

Dear Judge Broderick,

We, along with The Fried Firm PLLC, represent Defendants and we submit this letter to request a stay of discovery while we attempt to resolve this action.

The Defendants, a sports bar and the owner, have limited funds. Any litigation expenses are best spent in preparing for and attending mediation. We have a mediator, as well as a January 20, 2022 date for mediation, during which all parties will be present virtually. The Defendants have made a demand, and Plaintiffs have made an offer. The parties and the mediator have also had a productive call to discuss the mediation and make preparations in advance. In sum, we believe the parties are on track to reaching a settlement.

Thus, we ask that this Court stay discovery until the mediation process is complete. We have spoken with Plaintiff's counsel who consented to this request for a stay, but has not read this letter.

We thank the court for considering this request.

Respectfully,

/s/

Rob Rickner